

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DEANNA JOHNSON,

Plaintiff,

v.

FORD MOTOR COMPANY,  
a Delaware corporation,

Defendant.

U.S. District Court No. 2:19-cv-10167

Honorable Gershwin A. Drain  
Magistrate Elizabeth A. Stafford

---

STERLING ATTORNEYS AT LAW,  
P.C.

Carol A. Laughbaum (P41711)  
Attorneys for Plaintiff  
33 Bloomfield Hills Pkwy., Ste. 250  
Bloomfield Hills, MI 48304  
(248) 644-1500  
claughbaum@sterlingattorneys.com

KIENBAUM HARDY VIVIANO  
PELTON & FORREST, P.L.C.

Elizabeth P. Hardy (P37426)  
Julia Turner Baumhart (P49173)  
Attorneys for Defendant  
280 N. Old Woodward Avenue  
Suite 400  
Birmingham, MI 48009  
(248) 645-0000  
ehardy@khvpf.com  
jbaumhart@khvpf.com

---

**DEFENDANT FORD MOTOR COMPANY'S  
PRELIMINARY WITNESS LIST**

Defendant Ford Motor Company, by its undersigned counsel, states that it presently anticipates that it may call any or all of the following witnesses in any trial of the captioned matter.

1. LaDawn Clemons, Crew Operations Manager, Dearborn Truck Plant, c/o Ford's counsel;
2. Mary Fletcher, Process Coach, Dearborn Truck Plant, c/o Ford's counsel;
3. Leslie Harris, HR Supervisor, Dearborn Truck Plant, c/o Ford's counsel;
4. Plaintiff Deanna Johnson, c/o her counsel;
5. Sandy Krus, Director, Ford Personnel Relations, c/o Ford's counsel;
6. Richard Mahoney, Senior Process Coach, Dearborn Truck Plant, c/o Ford's counsel;
7. William Markavich, Team Manager, Dearborn Truck Plant, c/o Ford's counsel;
8. Mario Spadafora, Ford Personnel Relations and/or other representative(s) of Ford Personnel Relations, c/o Ford's counsel;
9. Steve Wilcox, HR Manager, Dearborn Truck Plant, c/o Ford's counsel;
10. Kathy Baker, Specialist, HR Policies, Ford Employee Benefits Office, c/o Ford's counsel;
11. Records custodian and/or other representative(s) of Ford NESC and/or Ford Leaves & Terminations unit;
12. Records custodian and/or other representative(s) of Ford U.S. Payroll Department;
13. Records custodian and/or other representative(s) of Unicare;

14. Any and all medical or mental health practitioners or providers who examined or treated Plaintiff on any occasion;
15. Any and all former subordinates, coworkers, supervisors, or managers of Plaintiff;
16. Any and all past or present personnel of Ford Dearborn Truck Plant Medical and/or Ford Rouge Medical Office personnel;
17. Any and all records custodians for subpoenaed records;
18. Any and all necessary mental health expert witnesses, including but not limited to Dr. Elissa P. Benedek, forensic psychiatrist; and Dr. Donna Z. Rinnas, forensic psychologist; or expert witnesses of comparable qualifications, as yet to be identified;
19. Any and all necessary and not yet designated economic damages experts;
20. All necessary rebuttal and sur-rebuttal witnesses;
21. All necessary impeachment witnesses;
22. All witnesses listed on Plaintiff's witness list or on supplemental witness list(s);
23. All persons identified in the Complaint;
24. All persons identified in discovery responses, depositions, documents produced during discovery, or documents filed with the Court in this action; and
25. All witnesses who are unknown at the present time but who become known during the course of discovery or prior to trial.

Especially in light of Plaintiff's failure to appear for her duly noticed deposition and other lack of responsive communication in this matter, Defendant reserves the right to amend this Witness List to include additional witnesses

learned through discovery and/or to delete or otherwise amend those witnesses identified herein.

Respectfully submitted,

KIENBAUM HARDY VIVIANO  
PELTON & FORREST, P.L.C.

By: /s/Julia Turner Baumhart  
Elizabeth P. Hardy (P37426)  
Julia Turner Baumhart (P49173)  
Attorneys for Defendant Ford Motor  
Company  
280 N. Old Woodward Avenue, Suite 400  
Birmingham, MI 48009  
(248) 645-0000  
ehardy@khvpf.com  
jbaumhart@khvpf.com

Dated: August 2, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on August 2, 2019, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all parties on record, and I hereby certify that I have caused to be served via U.S. mail the foregoing document to the following non-ECF participants:

(no manual recipients)

/s/Julia Turner Baumhart

Kienbaum Hardy Viviano Pelton & Forrest,  
P.L.C.

280 N. Old Woodward Avenue, Suite 400  
Birmingham, MI 48009

(248) 645-0000

jbaumhart@khvpf.com

(P49173)

338398